U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 10
OFFICE OF ENVIRONMENTAL CLEANUP
Superfund Program

FIVE-YEAR REVIEW, Type I

McCarty's/Pacific Hide and Fur
Pocatello, Idaho

I. Introduction

Authority Statement.

EPA Region 10 conducted this review pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 121(c), the National Contingency Plan Section 300.44(f)(4)(ii), and Office of Solid Waste and Emergency Response [OSWER] Directive 9355.7-02 (May 23, 1991), and OSWER Directive 9355.7-02A (July 26, 1994). This is a statutory review. The purpose of a five-year review is to ensure that a remedial action(s) remains protective of human health and the environment and is(are) functioning as designed. This document will become a part of the Site File.

Site Characteristics.

The McCarty's/Pacific Hide and Fur Site ("the Site") comprises an area of approximately 16.9 acres in the northwest region of Pocatello, Idaho, bounded on the north by State Highway 30 West and on the south by the Union Pacific Railroad (UPRR) right-of-way. The Site is an aggregate of three contiguous properties, owned by UPRR, Pacific Hide and Fur Depot, Inc., and individual members of the McCarty family.

The McCarty property was used as part of a gravel mining operation as early as 1949. The property was later used as a metal salvaging yard from the late 1950's to 1983. Copper from transformers was removed and the casings scrapped. Residual oil, contaminated with polychlorinated biphenyls (PCBs), was apparently allowed to drain directly onto the ground.

Lead-acid batteries were also brought to the Site. Metal scrap and battery casings were found up to 4 feet thick across much of the McCarty property. Batteries were cracked open on-site, the acid in them allowed to drain onto the ground and the lead in the batteries sold for reprocessing.

EPA conducted an Emergency Removal Action at the Site in March 1983. Over 500 capacitors and 100 cubic yards of PCB-contaminated soil were

removed and disposed off-site. In September 1984, the Site was added to the National Priorities List under CERCLA. On September 9, 1986, a Partial Consent Decree was entered into by the potentially responsible parties (PRPs). The remedial investigation and feasibility (RI/FS) study was completed in the spring of 1988. The initial record of decision (ROD) for the Site was signed on June 28, 1988.

II. Discussion of Remedial Objectives; Areas of Non-compliance

The overall goal of a remedial action is to provide the most effective mechanism for protecting human health and the environment from contaminated media associated with a site. To facilitate selection of the most appropriate remedial action, Site-specific cleanup objectives that specify the contaminants of concern in each medium of interest, exposure pathways and receptors, and an acceptable contaminant level or range of levels that is protective of human health and the environment, were developed. Cleanup actions were deemed necessary at the Site because conditions there posed unacceptable long-term risks for current and future workers. EPA's objectives for the cleanup are presented below.

The cleanup objectives were accomplished by removing the PCB- and lead-contaminated soil in order to minimize exposure to contamination via direct contact, and therefore, further reduce Site risks.

CLEANUP OBJECTIVES

Environmental Media	Chemicals of Concern	Exposure Routes	Receptors	Cleanup Objectives
Soil and Dust	PCBs and Lead	Human exposure through the incidental ingestion of soil and resuspended dust.	Humans	Prevent ingestion of contaminated soil and dust at lead levels above 25 ppm (PCBs) and 1,000ppm (lead).
	Lead	Infiltration of soil contaminants to ground water and subsequent exposure to humans via the exposure routes for ground water.		Prevent infiltration/migration of contaminants in soil to ground water that would result in ground-water contamination in excess of the federal action level.
Ground Water	Lead	Ingestion		Prevent ingestion of ground water having contaminant concentrations above the federal action level.

PCB and Commingled PCB/Lead Cleanup (Operable Unit-1)

The remedial action identified in the June 1988 ROD addressed cleanup of the PCB contamination at the Site. The major components of the remedy selected in the June 28, 1988 ROD included:

(1) Determining which portions of the contaminated materials could practicably be excavated and processed (screened). Factors used in making this determination were worker and public health, and physical limitations of excavation and processing equipment.

(2) Excavation of all highly contaminated materials which could practicably be excavated and processed.

(3) Excavation of all low level contaminated soils to 25 parts per million (ppm). Excavation would cease when those soils containing contaminants that exceeded the 10^{-4} to 10^{-7} cancer risk values had been removed. The 25 ppm PCB soil cleanup level corresponded to a risk range of 3×10^{-4} to 5×10^{-6}.

(4) Immobilization of processed material in the fixation matrix.

(5) Consolidation of remaining materials of concern.

(6) Construction of a bottom liner, where necessary.

(7) Construction of a cap over the entire unit.

(8) Construction of groundwater monitoring wells.

(9) Removal from service of existing groundwater monitoring wells which were no longer needed.

Prior to initiating any cleanup activities, results from a treatability study finalized in October 1990 indicated that unacceptably high levels of lead in Site soil were commingled with the PCB-contaminated soil. An amended ROD was signed on April 29, 1992. The major components of the selected remedy for PCB- and commingled PCB/Pb-contaminated soils included:

(a) Excavation, processing, transport and disposal of approximately 8,200 cubic yards of PCB-contaminated and commingled PCB/Pb-contaminated soils as follows:

(i) Approximately 6,500 cubic yards of untreated PCB-contaminated waste will be disposed in an approved, off-site Toxic Substances Control Act (TSCA) landfill.

(ii) Approximately 900 cubic yards of commingled PCB/Pb-contaminated soils, designated as Resource Conservation and Recovery Act (RCRA) characteristic wastes, will be solidified and disposed in an approved, off-site hazardous waste landfill.

(iii) Approximately 100 cubic yards of RCRA characteristic, commingled PCB/Pb-contaminated soils containing halogenated organic compounds in excess of 1,000 parts per million (California List Waste) will be transported to an off-site incinerator, incinerated and the ash will be solidified and disposed in an approved, off-site hazardous waste landfill.

(iv) Approximately 700 cubic yards of debris (scrap material) will be decontaminated, stockpiled and placed under a protective cover on-site.

(b) Backfilling, grading and restoration of surface drainage will be implemented to the extent that site restoration does not interfere with the on-going investigation and future remediation of other potential soil and groundwater operable units. During the remedial action, soil was excavated, verification samples were collected from each sector following excavation, and analyzed to confirm achievement of the PCB cleanup level, established in the 1988 ROD at 25 ppm.

Over 15,000 tons of excavated materials were disposed at the Envirosafe Services Inc. facility in Grandview, Idaho. About 2,500 tires were disposed at the Chemical Waste Management facility in Arlington, Oregon. Seventy-five capacitors and five intact transformers found during remedial work were incinerated at the Rollins Environmental Services, Inc., facility in Deer Park, Texas. All of these materials were characterized as contaminated with PCBs in concentrations greater than 25 ppm. Approximately 9,000 tons of PCB-contaminated soil above 25 ppm and with concentrations of lead in leachate above the toxicity characteristic leachate procedure (TCLP) level of 5 ppm lead were stabilized before disposal at Envirosafe. Fifty-four pieces of scrap were decontaminated and left on-site for future disposition.

On October 23, 1992, a final inspection was conducted by EPA, the Idaho Department of Environmental Quality, PRP representatives and their contractors and consultants. Site work for this operable unit was deemed complete per the amended ROD and demobilization from the Site was completed shortly thereafter.

Final Cleanup of Remaining Lead-Contaminated Soil (Operable Unit-2)

In September 1995, the Final ROD was signed addressing the remaining lead-contaminated soil and scrap which required remediation. The major

components of the selected remedy included:

- Decontaminating and recycling contaminated scrap material and, site preparation in anticipation of remedial activities;

- Excavating all lead-contaminated soil above the Site-specific cleanup level (lead concentrations exceeding 1,000 ppm);

- Treating soil which has been designated as a RCRA-characteristic waste;

- Properly disposing of both the non-treated and treated soil at a permitted, municipal landfill (operated under 40 CFR 258);

- Backfilling excavated areas with clean soil from off-Site, grading and restoring surface drainage;

- Implementing supplementary engineering controls and environmental monitoring, such as air monitoring, to minimize exposure to releases of hazardous substances during cleanup activities;

- Performing one year of quarterly ground-water monitoring to ensure the effectiveness of the cleanup and that no contaminants were mobilized during its implementation, followed by monitoring well abandonment;

- Requiring institutional controls including permanent Site fencing and restrictions limiting future property usage to industrial operations only. These restrictions will prohibit land uses allowed under residential/neighborhood commercial and professional zoning.

- Long-term operation and maintenance requirements including fence repair, as necessary. Reviews conducted no less often than every five (5) years to ensure the remedy continues to provide adequate protection of human health and the environment.

EPA estimated that 8,350 tons of material required excavation and 4,250 tons of that amount would require treatment. The final amount was significantly higher- 21,857 tons of soil was excavated and 9,985 tons of that amount required treatment prior to disposal. Soil with a lead TCLP concentration greater than 5 ppm was "stabilized" on Site using a proprietary treatment process prior to off-site disposal.

Mobilization of the equipment to the Site began on September 3, 1996. On September 10th, excavation in the east McCarty Sector began and later progressed to other contaminated areas of the Site. All Site soil that was believed to be lead-contaminated was sampled and analyzed to determine whether treatment was required prior to off-Site disposal. As previously stated, any lead-

contaminated soil that failed TCLP required treatment prior to disposal at the permitted, RCRA Subtitle D Fort Hall Municipal Landfill (operated under 40 CFR Part 258). The selected treatment was stabilization. The stabilization of the excavated soil and other debris that passed through a pre-screening process was conducted ex-situ using a pugmill and calibrated reagent feeder equipment. The excavated soil that passed TCLP was disposed at the Fort Hall Municipal Landfill without any treatment.

Other materials, such as cobbles, construction debris, and scrap metal were physically separated from the soil through the use of screening equipment. The oversize material was disposed on-site in the southeast corner of the McCarty property.

In the vicinity of the main shear and old bailer buildings, approximately 230 cubic yards of soil had been impacted by petroleum hydrocarbons. This soil was excavated and segregated, then analyzed for benzene, toluene and xylenes (BTEX) and total petroleum hydrocarbons as well as lead. Tests indicated that this soil did not require treatment. As such, it was accepted for disposal at the Fort Hall Municipal Landfill without treatment.

Significant amounts of asbestos-containing material (ACM) were also uncovered during remediation. The ACM was predominantly insulation mixed with soil and other debris. Manual segregation of the ACM during excavation was used to address this problem. Approximately 9 tons of ACM was removed during this action. An additional 361 tons of lead-contaminated soil mixed with the ACM required special treatment and handling due to the presence of the asbestos. This treatment involved mixing reagent with the lead-contaminated soil and ACM in a roll-off container. The resultant product contained greater than 1 percent ACM but less than 5 percent ACM. The product was transported in lined roll-off containers for disposal at the Fort Hall Municipal Landfill.

Approximately 550 tons of recyclable metal scrap was removed in preparation for soil remediation activities. Additional scrap in the active areas of the Pacific Hide and Fur operating business required processing and removal prior to initiation of remedial activities in these areas. Besides scrap metal, other materials requiring special handling and disposal were encountered, such as drums of phosphorous waste, emulsified grease, nickel-cadmium batteries, some additional ACM, and locomotive oil and air filters.

Numerous confirmatory samples were taken throughout the course of the remediation to ensure that cleanup levels were met. A pre-final inspection by EPA and the State of Idaho was conducted on November 21, 1996.

Site Restoration

Restoration activities were performed concurrent with remediation.

Backfilling and grading operations began on November, 21, 1996. Restoration activities included backfilling and grading, as necessary, and placement of perimeter fencing. Minimal imported backfill was required to achieve the desired restoration, except in areas of Pacific Hide and Fur's business operations where deeper pockets of soil had been excavated. The imported backfill was obtained from a commercial gravel quarry and approved by EPA. Also, clean on-site borrow material was used, where necessary.

All excavated areas of the Site were regraded, as necessary, to promote positive surface drainage and eliminate physical hazards. Significant regrading was conducted around the perimeter of the McCarty pit to ensure stability of the slope and minimize erosion.

Although not required as part of the remedy selected for the Site, upon completion of remedial activities in the high-use portions of the Pacific Hide and Fur operating facility and UPRR's property, a pavement cap was installed over the regraded soil (concrete pavement adjacent to the rail spur and asphalt pavement in the remainder of the area). This pavement was designed to support the expected equipment loads and sloped to promote positive surface drainage. Stormwater collection/dissipation facilities, complete with sumps and oil/water separator baffles, were installed at appropriate intervals throughout the paved area.

Permanent chain-link fencing was placed along the south edge of the UPRR property between the east end of the Site and the west end of the main shear. A six-foot high precast concrete barrier block fence has been constructed along the south boundary. A chain-link fence with an appropriate gate to accommodate railspur traffic, has been installed along the remainder of the south boundary of the Site to tie into the west boundary. Box cars have been placed along the west side of the property to secure the Site. Final activities and demobilization were completed during the week of December 9, 1996.

A Site visit was conducted by EPA on August 11, 1997 to assess the effectiveness of the remedial actions implemented at the Site. The remedial actions are functioning properly and human health and the environment are currently protected. The operation and maintenance of the properties appear to be adequately managed and funded by the responsible parties. No changes to the remaining quarterly ground-water monitoring requirements are proposed at this time. However, discussions between EPA and the PRPs are underway to determine whether additional cleanup of the Site will be undertaken so that the properties can be returned to unlimited use and unrestricted exposure. Unless additional cleanup is performed, the PRPs must place legally enforceable land use restrictions on the properties comprising the Site per the ROD requirements.

III. Recommendations

Based on the file review and Five-Year Review site inspection on August 11,

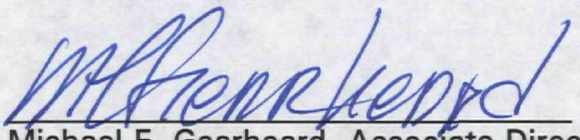
1997, EPA encourages the responsible parties to implement "best management practices" (BMP) when addressing O&M activities, and to move expeditiously towards establishing institutional controls. These BMP recommendations include ensuring that proper fencing is in place and maintained per the ROD, keeping monitoring well surfaces free of dirt and debris, minimizing erosion in areas where ruts, mud and free-standing water have accumulated, and avoiding spilling or disposing of oily material in remediated areas. As previously stated, EPA and the PRPs are currently engaged in discussions regarding additional cleanup at the Site. Should additional efforts be undertaken, EPA will assess the need for institutional controls (i.e., land use restrictions) currently required in the Final ROD if the properties are to be returned to unlimited use and unrestricted exposure.

IV. Statement on Protectiveness

I certify that the remedies selected for this Site remain protective of human health and the environment.

V. Next Five-Year Review

If no additional cleanup of the Site is undertaken, I conclude that the next statutory Five-Year Review be conducted by September, 1999. Although this review is less than five (5) years from the date of this review, it is based on the requirement for performance of a statutory review every five years from initiation of the first remedial action at a site. The first remedial action taken at this Site was in September, 1989.



Michael F. Gearheard, Associate Director
Office of Environmental Cleanup

Date

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Michael F. Gearheard, Associate Director — Date
Office of Environmental Cleanup

CONCURRENCE

INITIAL	aw				
NAME	WILLIAMSON	OESTERLE			
DATE	9/25/97	9/25/97			